



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

November 20, 1996

Mr. Philip Otis  
U.S. Department of the Navy  
Northern Division - NAVFAC  
10 Industrial Highway  
Code 1811/PO - Mail Stop 82  
Lester, PA 19113-2090

Re: Review of Sites 6, 10 & 11 Draft Final Proposed Plans (PP), Former Naval Construction Battalion Center, Davisville, RI

Dear Mr. Otis:

Pursuant to § 7.6(g) of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency (EPA) has reviewed the subject documents. Most comments have been satisfactorily addressed, except for comments #2, 22, and 23 which have not been fully addressed. In particular, the Navy has not yet fulfilled the requirement for the remedial investigation (RI) to be complete prior to the start of the public comment period because the Navy has not yet produced a final ecological risk assessment (ERA) and human health risk assessment (HHRA) for Sites 6, 10 & 11.

In EPA's comment letter concerning the draft of the subject PP dated October 1, 1996, EPA stated that it could not concur with the Navy's proposal of no action until the administrative record for these operable units (OU) is complete. The administrative record for the OUs will not be complete until the Navy submits a final ERA and HHRA. We also requested a schedule as to when the revised HHRA and the ERA, for all three sites, would be submitted. We have since received the revised proposed plans, but have not received the schedule for the completion of the HHRA and ERA.

Please be advised that the RI for these OUs will not be considered complete until the Navy submits final HHRA and ERA which are satisfactory to EPA. The complete administrative record for these OUs must be available for public review and comment at the time the PP is issued. Since the current FFA schedule requires the Navy to submit a draft final ROD with responsiveness summary by January 25, 1997, these documents should have already been submitted to EPA for review.

Accordingly, EPA does not approve the issuance of the PPs for the source control OUs for Site 6 & 11 and for the whole site OU for Site 10, until the ERA and HHRA have been finalized and approved by EPA.

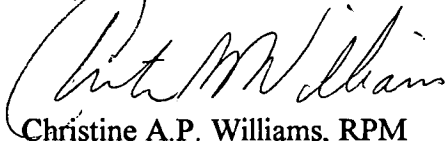
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We look forward to completing these OUs within the agreed to schedule. Please call me if you have any questions concerning this letter at (617) 573-5736.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine A.P. Williams".

Christine A.P. Williams, RPM  
Federal Facilities Superfund Section

cc: Richard Gottlieb, RIDEM  
Walter Davis, NCBC  
Bill Brandon, EPA  
Bob DiBiccaro, EPA  
Jayne Michaud, EPA  
Sarah White, EPA  
Jim Shultz, EA  
Marilyn Cohen, ToNK  
Howard Cohen, RIEDC